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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 *****

15 ALLSTATE INSURANCE COMPANY,
16 ALLSTATE PROPERTY & CASUALTY
INSURANCE COMPANY, ALLSTATE
17 INDEMNITY COMPANY, and ALLSTATE
FIRE & CASUALTY INSURANCE
18 COMPANY,

19 Plaintiffs,

20 v.

21 RUSSELL J. SHAH, MD, DIPTI R. SHAH,
MD, RUSSELL J. SHAH, MD, LTD., DIPTI
22 R. SHAH, MD, LTD., and RADAR
MEDICAL GROUP, LLP dba UNIVERSITY
23 URGENT CARE, DOES 1-100, and ROES
101-200,

24 Defendants.

CASE NO. 2:15-cv-01786-APG-CWH

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE THE FILING
DATE OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION TO QUASH
OR MODIFY SUBPOENAS AND FOR
PROTECTIVE ORDER [ECF No. 227 and
ECF No. 228]**

(Second Request)

25 AND RELATED CLAIMS
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2:15-cv-01786-APG-CWH

STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE FILING DATE OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS' MOTION TO QUASH OR MODIFY SUBPOENAS AND FOR PROTECTIVE ORDER [ECF
No. 227 and ECF No. 228]

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (collectively, the “Allstate
4 Parties”), and Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D.,
5 RUSSELL J. SHAH, MD, LTD., DIPTI R. SHAH, MD, LTD., and RADAR MEDICAL GROUP,
6 LLP dba UNIVERSITY URGENT CARE (collectively, the “Radar Parties”), by and through their
7 respective attorneys of record, stipulate and agree as follows:

8 **RECITALS**

9 WHEREAS, on January 29, 2018, the Radar Parties filed and served their Motion To Quash
10 Or Modify Subpoenas And For Protective Order (Hearing Requested) [ECF No. 227 and ECF No.
11 228]; and

12 WHEREAS, the Allstate Parties’ Opposition to the Motion To Quash Or Modify Subpoenas
13 And For Protective Order was originally due on February 12, 2018, and following the first request for
14 extension, is now presently due on February 19, 2018.

15 **STIPULATION**

16 1. The date for the Allstate Parties to file and serve their Opposition to the Radar Parties’
17 Motion To Quash Or Modify Subpoenas And For Protective Order is continued from February 19,
18 2018 to February 23, 2018.

19 Good cause exists for the above continuance as the spouse of one of the Las Vegas counsel for
20 the Allstate Parties gave birth to a child on February 6, 2018, and counsel’s office continues to require
21 additional time to ensure resources are properly allocated to respond to the Motion. Furthermore, due
22 to inadvertence, the original extended deadline of February 19, 2018 falls on a holiday when Allstate’s
23 counsel’s office is closed.

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1 This is the second stipulation for an extension of time for the Allstate Parties to file their
2 Opposition to the Radar Parties' Motion To Quash Or Modify Subpoenas And For Protective Order.
3 This stipulation is made in good faith and not to delay the proceedings.

4 IT IS SO STIPULATED.

5 Dated: February 16, 2018

Dated: February 16, 2018

6 McCORMICK, BARSTOW, SHEPPARD,
7 WAYTE & CARRUTH LLP

BAILEY KENNEDY

8
9 By: /s/ Dylan P. Todd

By: /s/ Joshua P. Gilmore

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16 *Attorneys for Plaintiffs/Counterdefendants*

17 **ORDER**

18 IT IS SO ORDERED.

19 DATED February 20, 2018

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22 UNITED STATES MAGISTRATE JUDGE
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 16th day of February, 2018, a true and correct copy
3 of **STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE FILING DATE OF**
4 **PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO QUASH OR MODIFY**
5 **SUBPOENAS AND FOR PROTECTIVE ORDER [ECF No. 227 and ECF No. 228]** was served
6 via the United States District Court CM/ECF system on all parties or persons requiring notice.

7
8 Dennis L. Kennedy, Esq.
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14 *Attorneys for Defendants*
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By /s/ Cheryl A. Schneider
Cheryl A. Schneider, an Employee of
MCCORMICK, BARSTOW, SHEPPARD,
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